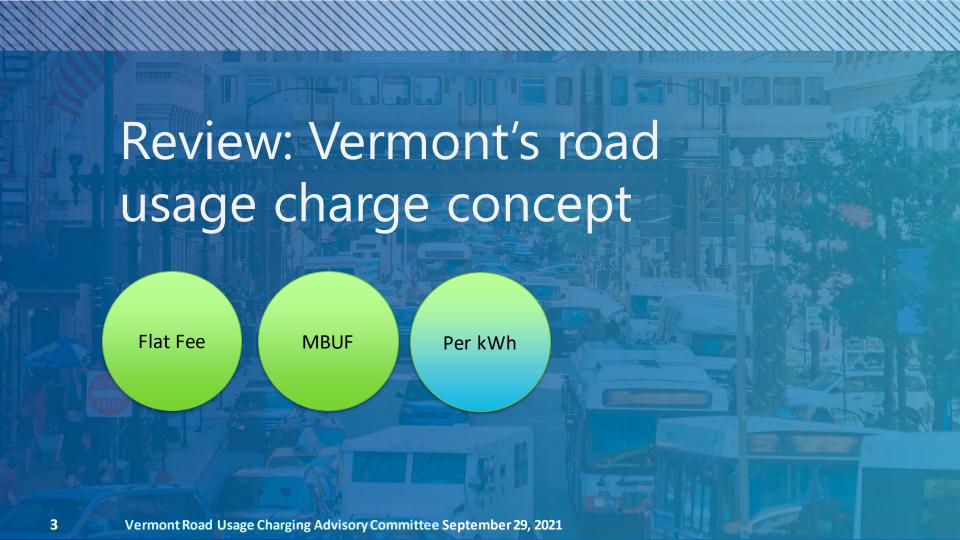


Agenda

2PM	Welcome, Roll Call and Review of the Agenda (Chair, Michele Boomhower, VTrans)
2:10	Stakeholder engagement • Presentation of outreach results (Mark Fowler and Jonathon Slason, RSG)
2:25	MBUF system definition • Presentation of MBUF system definition (James Whitty and Matthew Dorfman, CDM) • Preliminary MBUF system definition recommendation
3:25	Per kWh fee system definition • Presentation of per-kWh fee system definition memo (James Whitty, CDM) • Preliminary Per kWh system definition recommendation
4:20	Fee structure and rate setting • Presentation of fee structure (Scott Wilson, CDM)
4:50	PublicComment
4:55	Next Steps and Agenda for third meeting • Topics for third meeting (James Whitty, CDM)
5PM	Adjournment



Vermont's Road Usage Charge Concept

Applicability	Fee Mechanisms	Possible Eligible Vehicles
VT Registered Vehicles	 Flat Fee, with Optional Mileage-Based User Fee Without location With Location 	 All Electric Plug-in Electric Hybrid High efficiency vehicles
Out of State Vehicles	Per-kWh Transportation Fee at Public Charging Stations	All ElectricPlug-in Electric Hybrid

What determines feasibility for a Vermont RUC program

- A workable system design compatible with existing systems
- Consistency with guiding principles
- Manageable costs
- Adequate net revenues
- Political acceptance



Flat Fee / MBUF for VT Registered Vehicles Basic elements and Key Considerations

Flat Fee

MBUF

Annual Registration fee – Typical functions



Identify subject vehicle and its owner/lessee—connect with vehicle registry



Provide invoice to owner/lessee—notice of the charge



Collect payment—a way or ways to pay



Issue acknowledgement of payment—a receipt



Enforce payment—mechanisms for ensuring everyone pays



Remit net revenues to road fund—integrate revenue collection with financial systems



Annual Flat Fee – Key considerations



Identify subject vehicle and its owner/lessee—connect with vehicle registry



Identify vehicle's engine type* – collect data directly or connect with VIN decoding service



Integration with external systems* – integration with MBUF system



Provide invoice to owner/lessee—notice of the charge



Collect payment—a way or ways to pay



Issue acknowledgement of payment—a receipt



Enforce payment—mechanisms for ensuring everyone pays



Remit net revenues to road fund—integrate revenue collection with financial systems



Refund* – flat fee refunds

Enhanced registration functions and new functions* to administer annual flat fee

Annual Flat Fee – Key considerations



Identify subject vehicle and its owner/lessee—connect with vehicle registry



Identify vehicle's engine type* – collect data directly or connect with VIN decoding service



Integration with external systems* – integration with MBUF system



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Issue acknowledgement of payment—a receipt



Enforce payment—mechanisms for ensuring everyone pays



Remit net revenues to road fund—integrate revenue collection with financial systems



Refund* – flat fee refunds

Policy & systems questions



Which vehicles are covered? Which rates to apply?



Which mechanisms to identify eligible vehicles?



Allow flat fee payers to opt into MBUF?



Which refund mechanisms for payers who opt into MBUF?

MBUF – Key considerations



Identify subject vehicle and its owner/lessee—connect with vehicle registry



Generate distance traveled data for subject vehicle over designated time* – report data



Access distance data*—receive reporting of distance data



Apply distance charge rates*—data process to determine amount of charges



Provide invoice to owner/lessee—notice of the charge



Collect payment—a way or ways to pay



Issue acknowledgement of payment—a receipt



Enforce payment—mechanisms for ensuring everyone pays



Remit net revenues to road fund—integrate revenue collection with financial systems



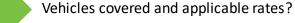
Process refunds* - MBUF refunds

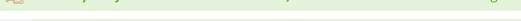
Enhanced registration functions and new functions* to administer MBUF

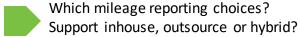
MBUF – Key considerations



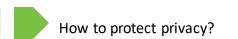




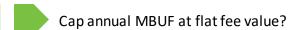






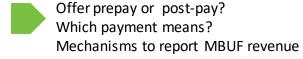






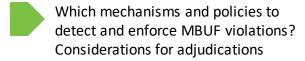






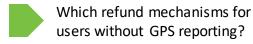






Enforce payment—mechanisms for ensuring everyone pays





Process refunds* – MBUF refunds



Flat Fee

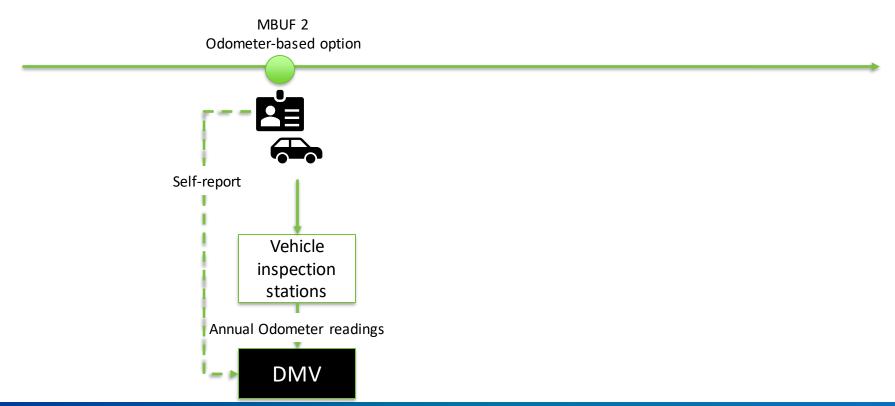
MBUF 1 Self reporting option

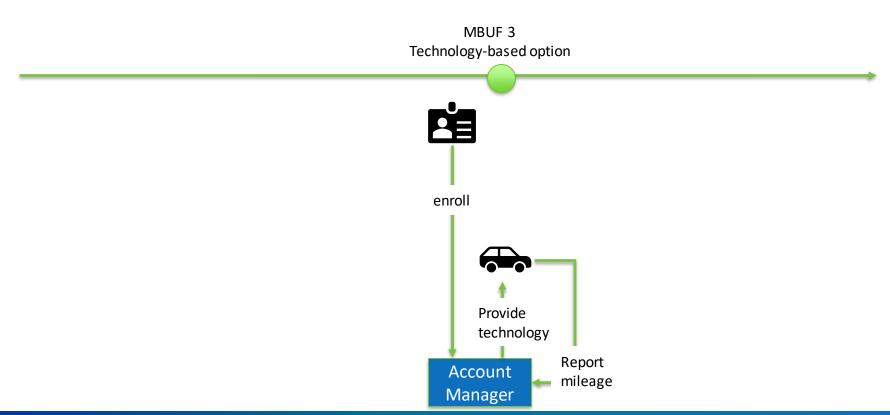
MBUF 2 Odometerbased option MBUF 3 Technology based option MBUF 4 Odometerbased and tech-based options

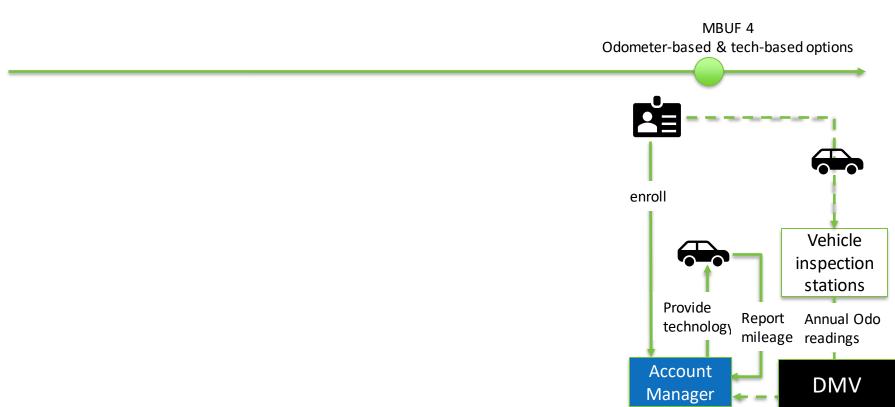
MBUF 1 MBUF 2 MBUF 3 MBUF 4
Self reporting option Odometer-based option Technology-based option Odometer-based & tech-based options



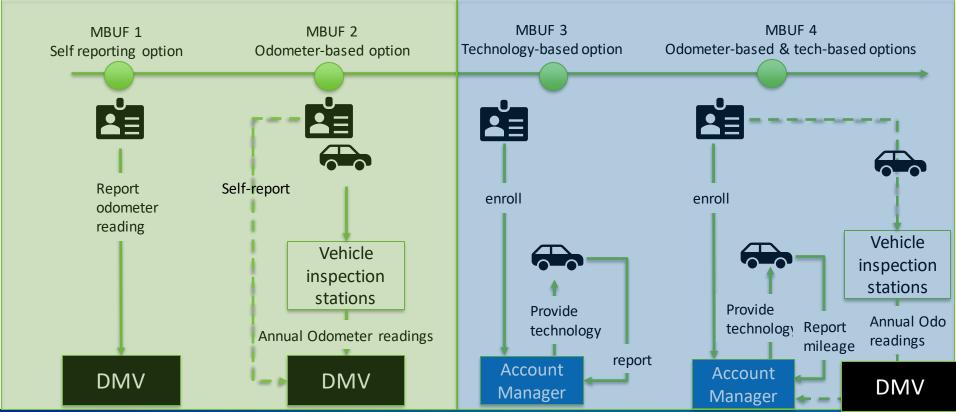
MBUF 1 Self reporting option Report odometer reading DMV







Summary of MBUF options Odometer-based & Account-based reporting options



FF & MBUF cost considerations

MBUF system design options (odometer or accountbased)

MBUF delivery strategy (inhouse, outsource, hybrid)

Rate setting (flat fee rate and MBUF rate)

MBUF system design options – reporting methods

- Odometer reporting
 - Self-reporting
 - Use of data reported at annual vehicle inspection
 - Odometer image capture
- Automated reporting
 - ODB-II Plug-in devices
 - Native automaker telematics
 - Smartphone app









MBUF delivery strategy

- There are three MBUF reporting paradigms for estimating costs:
- 1. Odometer. The state only offers odometer reporting.
- 2. Automated. The state offers only automated mileage reporting.
- Hybrid. The state offers a hybrid between odometer and automated reporting

For each reporting paradigm, the state may apply different delivery strategies:

- Support inhouse
- Outsource to private vendors
- Hybrid solution (Administer odometer-based methods inhouse and outsource automated methods)



Key policy decisions impacting cost of collection for FF&MBUF

Flat fee rate.

- The relative rates at which the flat fee is set will impact the choice drivers will make between the flat fee and the mileage-based user fee.
- For example, if the flat fee is equal to the amount that the median vehicle would pay in MBUF, then we would expect half of vehicles to choose MBUF and the other half to choose the flat fee.
- Those choosing MBUF would be the 50% who reason to save money by driving less than average and, therefore, saving money compared to the flat fee.



Annual cost estimation for FF/MBUF operating scenarios

Operating scenarios operations	Scenario 1: Flat fee \$209 Hybrid	Scenario 2: Flat fee \$278 Odometer	Scenario 3: Flat fee \$139 Odometer	Scenario 4: Flat fee \$139 Hybrid	Scenario 5: Flat fee \$209 Automated
Flat fee (% of Average MBUF)	150% (\$209)	200% (\$278)	100% (\$139)	100% (\$139)	150% (\$209)
MBUF system design choices	Odometer & Automated	Odometer	Odometer	Odometer & Automated	Automated
MBUF delivery strategy	State	State	State	State CAM	CAM
% Choosing MBUF over flat fee	83%	97%	50%	50%	83%
% Choosing Odometer MBUF over Automated	80%	100%	100%	50%	0%
% of revenue collected	2030: 15% 2040: 10%	2030: 6% 2040: 2%	2030: 6% 2040: 1%	2030: 20% 2040: 16%	2030: 27% 2040: 22%



Annual cost estimation for FF/MBUF operating scenarios

Operating scenarios operations	Scenario 1: Flat fee \$209 Hybrid	Scenario 2: Flat fee \$278 Odometer	Scenario 3: Flat fee \$139 Odometer	Scenario 4: Flat fee \$139 Hybrid	Scenario 5: Flat fee \$209 Automated
Flat fee (% of Average MBUF)	150% (\$209)	200% (\$278)	100% (\$139)	100% (\$139)	150% (\$209)
MBUF system design choices	Odometer & Automated	Odometer	Odometer	Odometer & Automated	Automated
MBUF delivery strategy	State	State	State	State CAM	CAM
% Choosing MBUF over flat fee	83%	97%	50%	50%	83%
% Choosing Odometer MBUF over Automated	80%	100%	100%	50%	0%
% of revenue collected: 2030 → 2040	2030: 15% 2040: 10%	2030: 6% 2040: 2%	2030: 6% 2040: 1%	2030: 20% 2040: 16%	2030: 27% 2040: 22%

Key takeaways

Lower costs of collection as more users join MBUF program



Odometer-based methods most cost efficient to operate.

Major driving costs is the number of vehicles choosing automated reporting



System compatibility & needs

Consistency with Guiding Principles

Manageable costs

Adequate net revenues

Political acceptance

Guiding principles for policy and system design

Do No Harm

- Revenue neutrality
- Sustained EV uptake

Equitable & Fair

- User pay system
- Users have choices
- Privacy and security data protected
- Equitable cost distribution (rural/urban, income)

Feasible & Efficient

- Ease of administration/minimal government burden
- Enforceable
- Simplicity of compliance and ease of use
- Accurate and system performance

Transparent and Accountable

- Open system
- Open to competing vendors
- Accountable oversight

Adaptive for the future

- Integration with other state policies
- Interoperability with other state systems
- Flexible, secure, and scalable



Feasibility Assessment: Consistency with Guiding Principles

MBUF options Guiding Principles	Annual Flat fee	MBUF 1 Self reporting option	MBUF 2 Odometer-based option	MBUF 3 Tech-based reporting options	MBUF 4 Odometer based & tech- based reporting options
Do Not Harm	Medium	High	High	High	High
Equitable & Fair	Low	High	High	High	High
Feasible & Efficient	High	High	High	Medium	Medium
Transparent & Accountable	High	Low	High	High	High
Adaptive for the Future	Low	Low	Low	High	High

Feasibility Assessment: Systems compatibility & needs

MBUF options Systems compatibility	Annual Flat fee	MBUF 1 Self reporting option	MBUF 2 Odometer-based option	MBUF 3 Tech-based reporting options	MBUF 4 Odometer based & tech- based reporting options
Vehicle registry system (DMV)	Existing	Enhanced	Enhanced	n/a	n/a
Odometer-based system (Safety inspection)	n/a	n/a	Existing	n/a	Existing
Account-based system	n/a	n/a	n/a	New	New

System exists to support MBUF option(s)

Enhancement required to existing system to fully support MBUF option New system required to support MBUF option



Feasibility Assessment: Manageable costs

Costs	UF options	Annual Flat fee	MBUF 1 Self reporting option	MBUF 2 Odometer-based option	MBUF 3 Tech-based reporting options	MBUF 4 Odometer based & tech- based reporting options
Relative syste (as a % of reve collected)		Minimal	Minimal	Low (2-6%)	High (22-27%)	Medium (15-20%)



Policy decisions	Options
Which vehicles are covered?	 EV/PHEV only All alternative fuel vehicles High mpg liquid fuel vehicles All vehicles



Policy decisions	Options
Rate considerations	 Allow flat fee payers to opt-in to MBUF? Cap annual MBUF at flat fee value?



Policy decisions	Options
Refunds or exemptions for vehicles without GPS reporting	 Standard exemption (e.g., 3,000 miles) Variable exemption (based on registration location) Manual refunds No refunds



Policy decisions	Options
Privacy	 non-location based MBUF reporting require private companies to process location data guarantee privacy rights in law offering further privacy rights in user agreements



Key organizational decisions for FF&MBUF

Policy decisions	Options
Account Management structure	 Implement a state operated system Implement a private sector operated system Implement a hybrid system operated by state and private sector
Separation of roles between state and private sector	 Typical private sector functions Account management Technology distribution and management Typical state managed functions RUC Accounting (System to compile data on MBUF usage) Enforcement (Detection and penalization of MBUF violations) Adjudication (Civil appeal of any assigned penalties)
Procurement strategy for RUC operations	Single vendor or open market with multiple vendors



Future system design decisions for FF&MBUF – Roadmap

Future Need	State activities to meet the need
Interoperability with other states	Sign agreements with other states.Create an interoperability hub with other states.
Integration with automakers	 Encourage automakers to support MBUF. Integrate automaker support when its available.
Transition MBUF to all light vehicles	Plan transition (technical, financial, operational)Execute plan
Support of commercial fleets	Ensure DMV and/or account manager have fleet supporting interface
Inclusion of heavy vehicles	 Consider if and if so, when, to include heavy vehicles If they will be included, plan policies, technologies, and operations as both will differ from those for light vehicles Execute plan



Flat Fee/MBUF recommendations

Short term

- **1.** Begin with a small, flat fee/MBUF option program.
- 2. Use vehicle inspection odometer records as a basis for MBUF for most vehicles.
- **3.** Use self-reporting or odometer image capture to get odometer records in cases of vehicles exiting the state or leaving the program.

Longer term

- **4.** If enough Vermonters show interest in location-based reporting, the MBUF program should eventually include a Commercial Account Manager offering OBDII plug-in devices for vehicles that do not want to pay for out-of-state or off-road miles driven. This service need not be in place when the system starts.
- 5. If a Commercial Account Manager is used, employ an open system (open specifications) from the start. When the market is large enough to support multiple account managers, create an open market.
- 6. Include privacy protection and enforcement provisions in any law creating an MBUF.
- 7. Consider program expansion after launch and evaluation.





Per kWh

Vermont's per-kilowatt hour fee concept

A **per kilowatt hour fee** is a volumebased fee on the amount of energy transferred to an electric vehicle over one hour. Per kilowatt hour fee would be assessed on electricity recharging at public charging stations and paid by non-resident electric vehicles drivers travelling on Vermont roads.

Vermont resident EV drivers would not bear the burden of paying the per-kWh fee.



Per kWh – system functions



Identify subject vehicle and its owner/lessee – EV owner presents as payer at PCS



Generate kWh data – Recharge subject vehicles at public charging stations



Measure consumption data (kWh or Time of Use) – PCS accurately measures kWh data



Apply per-kWh fee rate to consumption data – Calculate fee amount owed



Provide invoice to owner/lessee – notice of the charge



Collect payment – support way(s) to pay



Issue acknowledgement of payment – provide receipt for payment



Enforce payment – mechanisms for ensuring everyone pays



Remit net revenues to road fund – integrate revenue collection with financial systems

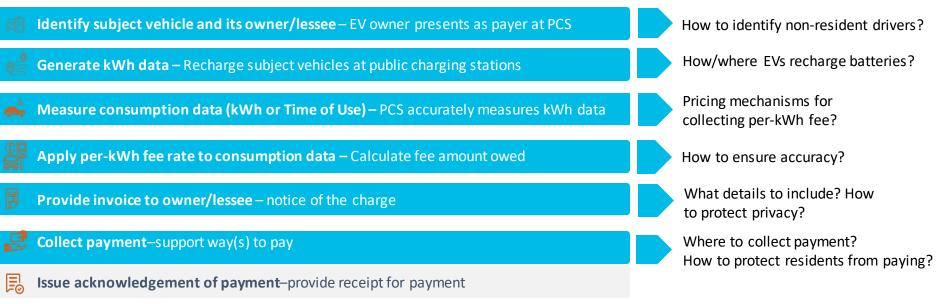


Refunds - refund mechanisms



Per kWh – key considerations

Enforce payment—mechanisms for ensuring everyone pays





Refunds – refund mechanisms

Which options to protect Vermonters from paying the fee?



Challenges for a per-kWh fee

- Which business processes for collecting the per-kWh fee?
- How to ensure only nonresident EV drivers are responsible for per-kWh fee?
- How to ensure the accuracy of kWh measurement?
- How to recover the added cost of new data collection and billing system upgrades per kWh measurement and fee collection?
- How to maintain a low cost of collection?
- How to protect the privacy of sensitive information?

Many of these questions do not have answers due to the use of emerging technology, lack of standard practices across the industry for data collection, measurement and pricing.





Charge Vehicles – How EVs recharge batteries

Three levels of EV charging:

- **Level 1**: Alternative-Current (AC) 120 volt. A typical electric outlet at home.
- Level 2: Alternative-Current (AC) 208 volt to 240 volt for clothes dryer etc.
- Level 3: Direct-Current (DC) 480 volt to 900 volt for fast charging and supercharging (Tesla).

Commercial EV public charging stations apply Level 2 and Level 3 charging.



Pricing mechanisms for collecting per-kWh fee?

Two existing options – kWh and Time of Use

Public charging	AC Level 2	DC Fast Charging (Level 3)
Blink	kWh	Time of Use
Tesla	kWh	Time of Use
Charge Point	Time of Use	kWh
EVGo	Time of Use	Time of Use
Electrify America	Time of Use	kWh
Beneficial Charging	Free or at cost	Free or at cost

Where to collect payment?

Four options based on electricity distribution stream

DISTRIBUTION	WHO PAYS	DESCRIPTION
DOWNSTREAM	EV OWNER PAYS AT RETAIL	Station owner collects fee from EV owner based on kWh transferred.
MIDSTREAM	CHARGING STATION OWNER PAYS (GAS TAX MODEL)	Station owner pays fee to state and builds cost into retail price.
UPSTREAM	ELECTRIC UTILITY PAYS	Utility pays fee to state and builds cost into wholesale price.
MIDSTREAM	BENEFICIAL (FREE & AT- COST) CHARGING STATION OWNER PAYS	Beneficial station pays fee and collects reimbursement, donation or nothing from EV owners.



How to ensure accuracy of kWh measurement? Availability of revenue-grade metering for per-kWh fee

	(1) EV OWNER PAYS AT RETAIL	(2) CHARGING STATION OWNER PAYS (GAS TAX MODEL)	(3) ELECTRIC UTILITY PAYS	(4) BENEFICIAL CHARGING STATION OWNER PAYS
Dedicated utility meter	No	No	Yes	No
Submetering	Maybe	Maybe	n/a	No
EV charging equipment	Yes	Yes	n/a	Yes

Options to protect Vermonters from paying per-kWh fee

	(1) EV OWNER PAYS AT RETAIL	(2) CHARGING STATION OWNER PAYS	(3) ELECTRIC UTILITY PAYS	(4) BENEFICIAL CHARGING STATION OWNER PAYS
Present receipts of fee to get credit	X			
Present Vermont identification to get discount	X	Χ		Χ
Input discount code to get discount	X	X		X
Use receipts of electricity purchase to calculate credit		Х		Х

Comparisons to other states that enacted per-kWh fees/taxes

	IOWA	OKLAHOMA
Who pays tax	Licensed electric fuel dealers	EV drivers
Where tax collected	Point-of-sale	Point-of-sale
Equipment required	In manner prescribed by Department of Revenue	Requires accurate metering system but exempts legacy systems
Resident exemption	No	No
Tax rate	\$0.026 per-kWh	\$0.03 per-kWh
Effective date	July 1, 2024	January 1, 2023



Per-kWh fee recommended findings

Recommended findings:

- Imposition of per-kWh fee concept on nonresident EV drivers at public charging stations is not imminently doable.
- The gas tax model (Charging Station Owner Pays) shows most promise for application of a per-kWh fee on all transfers of electricity to non-resident EVs at public charging stations but would require accurate revenue-grade metering equipment.
- Imposing a requirement for accurate metering equipment at public charging stations without a method for cost recovery would disrupt the current business operations of many existing public charging stations, especially benevolent stations, and therefore impede opening new EV public charging stations.

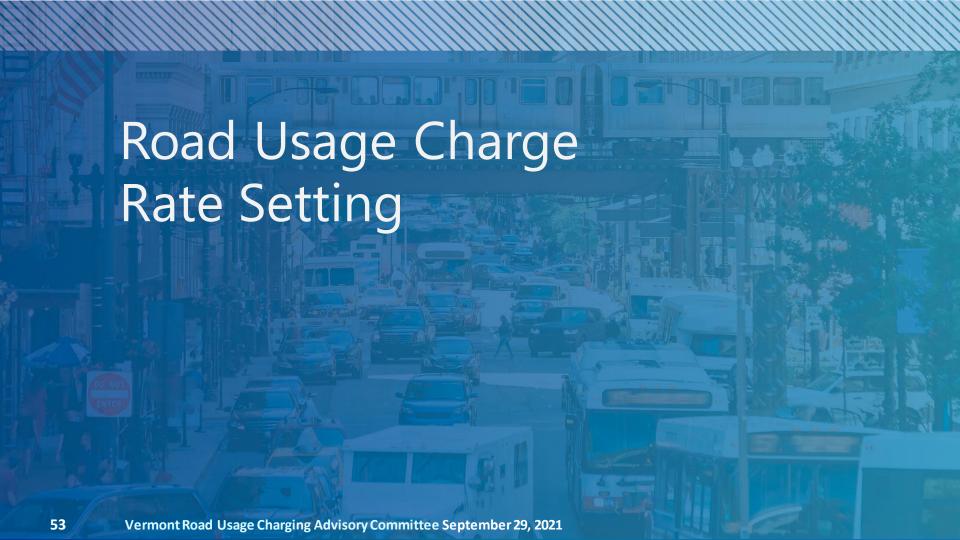


Per-kWh fee recommended actions

Recommendations:

- Vermont should undertake a pilot program to test the gas tax model approach to collection of the per-kWh fee. The pilot should include at least the following elements:
 - Research and analyze the cost and impact of requiring all public charging stations in Vermont to have the metering capability necessary to collection the fee.
 - Examine the possibilities for cost recovery of software and hardware upgrades at public charging stations.
 - Determine the impact of imposing the fee on beneficial public charging stations.
 - Evaluate the various possibilities for ensuring resident EV owners are not burdened by per-kWh fee.





Best practice rate setting in other jurisdictions

Three have established revenue collecting light-duty vehicle MBUF systems

Jurisdictions	Basis for rate	Applicable vehicles	AEV rate (Flat fee/MBUF)	PHEV rate (Flat fee/MBUF)
Oregon	Average gas tax paid per mile by vehicles not paying RUC	Light-duty vehicles of 40 MPG or greater	\$158 <u>or</u> \$0.018 per mile	\$76 or \$0.018 per mile
Utah	Average gas tax paid per mile by vehicles not paying RUC	AEVs and PHEVs only	\$120 <u>or</u> \$0.015 per mile	\$52 <u>or</u> \$0.015 per mile
New Zealand	Cost allocation model calculates rates to raise revenue for projected spending based on allocating costs by vehicle type and impact on spending	All light-duty vehicles not powered by gasoline or natural gas and all heavy- duty vehicles	\$0.076 per mile (AEVs exempt until March 31 2024) (No flat fee except registration)	Pays gas tax only at standard rate (\$1.86 gallon) (No flat fee except registration)

Guiding criteria for rate setting

- Revenue generating potential
 - Net revenue able to be generated
- Do No Harm
 - Avoid negative impacts on AEV/PHEV uptake
- Equitable & Fair
 - Equity and revenue neutrality
 - Economic efficiency
- Feasible & Efficient
 - Operational feasibility

Adaptive for the future

- Financial sustainability
- Flexibility



Updated fee estimates *methodology*

- 2013 estimates reviewed with updated data and assumptions
- Average fuel economy for new or all light-duty vehicles in Vermont?
- Average vehicle miles traveled for light-duty vehicles in Vermont
- Estimated average fuel consumption of PHEVs (to estimate gap in gas tax paid per mile compared to gasoline powered light-duty vehicles).
- Varying assumptions
- Unlike flat fee and MBUF, per kWh fee is not seeking to recover equivalent to gas tax paid

Additional data needed to refine estimates for per kWh fee and PHEV fees, such as proportions of energy charged at public charging stations, relative use of electricity vs. gasoline for PHEVs and recovery of costs of per kWh Vermont vehicle exemptions



Updated fee estimates - results

Type of fee/vehicle type	AEVs	PHEVs
Original flat fee estimates	\$120 (2013 prices)	\$71
Revised flat fee estimate	\$139	\$44
MBUF estimate	\$0.013 per mile	\$0.013 per mile (with gas tax credit) \$0.005 per mile (without gas tax credit)
Per kWh estimate	\$0.04 per kWh	\$0.04 per kWh

Flat fee estimate assumes MPG for all light-duty vehicles in Vermont and VMT for all light-duty vehicles is applicable, assumes PHEVs pay 68% of gas tax of average light-duty vehicle per mile



Equity and revenue neutrality

High level issues

- Owners of AEVs and PHEVs pay significantly less to use the roads than other light-duty vehicle owners
- Average light-duty vehicle age in Vermont is 9.9 years, but AEV age US-wide averages at 3.9 years, indicating <u>owners of AEVs tend to buy new vehicles</u>
- The amount of gas tax paid for a vehicle's road use is not capped
- A flat fee is effectively a cap on how much fee is levied to drive
- MBUF and a per kWh fee could be capped or not
- Revenue neutrality seeks to ensure <u>two different light-duty vehicles are</u> <u>levied on average the same</u> for similar road use patterns
- <u>Net revenue</u> neutrality should be considered (revenue after costs of collection for a mature system)



Equity and revenue neutrality

Rural vs. urban owners

- 55% of AEVs (53% of PHEVs) are owned in the three counties with the highest population density (where 44% of the population live)
- Research across nine states indicates <u>rural drivers do not drive on average</u> <u>significantly greater miles than urban drivers</u> (urban drivers drive more frequent shorter trips)
- Further data needed to establish Vermont profile of AEV/PHEV rural vs. urban users

Income and AEV/PHEV ownership

US wide data indicates

- 79% of AEV (80% of PHEV) purchases are from households earning >\$50k per annum (57% over \$100k per annum in income
- 78% of owners of AEVs and PHEVs are in households with two or more vehicles
- Profile of AEV/PHEV owners has not changed in eleven years

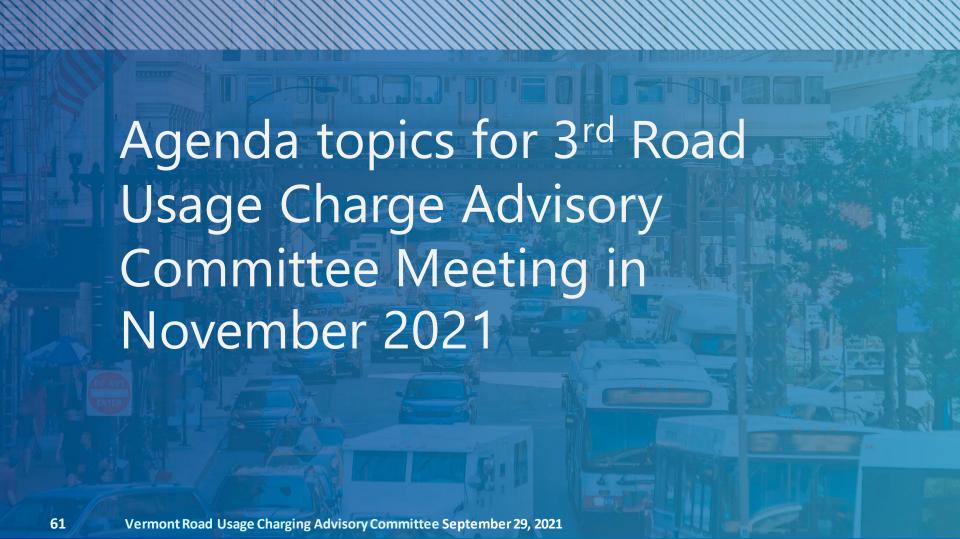


Future proofing revenues

Three best practice techniques have been applied elsewhere to ensure revenues are not eroded over time

- <u>INFLATION ADJUSTMENT BASED ON INFRASTRUCTURE COSTS</u>: Automatic adjustment of rates based on inflation *of types of expenditure that the fee is used to fund*
- MODEL REVENUE TO REFLECT CHANGES IN DRIVER BEHAVIOR: Regular revenue modeling of projected revenue based on actual observed fleet changes, VMT and energy consumption compared to forecasts
- UNDERTAKE A COST RESPONSIBILITY STUDY AND REGULARLY UPDATE IT: This should inform a
 revenue model, by forecasting future spending and use well established economic principles
 to allocate types of spending to different types of vehicles and fees, so fees reflect what
 money is being spent on whom.





Agenda topics

- Reports on additional stakeholder input
- Carryover topics from September 29th meeting
- Presentation: Financial analysis of Vermont Road Usage Charge Concept
- Presentation: RUC management and operational structure
- Presentation: RUC concept implementation v. pilot test
- Decisions:
 - Management and operational structure
 - Feasibility or pilot program for RUC Concept
 - Recommendation on implementation or pilot test